

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LEE GARVEY  
(OCA/USPS-T1-47-52)  
(October 28, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

*Emmett Rand Costich for*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Emmett Rand Costich*

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T1-47. Please refer to your response to OCA/USPS-T1-43.

- a. Please provide a firm date for implementation of the “new version” of the MOL system software referred to in your response to part (a) of that interrogatory.
- b. Please provide a firm date when the “association of presort qualification with job type characteristics can be accomplished” through electronic means.
- c. Please provide a firm date when the tabulations requested in parts (b)-(d) of that interrogatory can be generated.
- d. Please provide the tabulations requested in parts (b)-(d) of that interrogatory as soon as they can be produced.
- e. Is it your understanding that the tabulations requested in part (d) of this interrogatory differ from “data in keeping with the Commission’s Opinion regarding a market test for Mailing Online”? If so, please describe all differences.

OCA/USPS-T1-48. Please refer to your response to OCA/USPS-T1-44.

- a. In part a. of your response you state, “No system modification has been performed which would allow the storing and forwarding of sortation software reports.” Please reconcile this statement with your testimony at page 10, lines 16-18 (emphasis added): “Each batch address *file* is presorted to the maximum depth of sort *with a prepared manifest and mailing statement*, for transmission along with the print files.”
- b. Please provide copies of correspondence from the MOL system developer related to the ability or inability of the MOL sortation software to retain an

electronic version of the "prepared manifest and mailing statement" that is *transmitted electronically* to print sites. If no such correspondence exists, please explain the basis of your interrogatory response and provide documentary verification thereof.

- c. In part c. of your response you state, "The existing MOL system configuration and settings prevent the Postal Service from generating and storing mail.dat files." Please provide copies of correspondence from the MOL system developer related to the ability or inability of the existing MOL system to generate or store mail.dat files. If no such correspondence exists, please explain the basis of your statement and provide documentary verification thereof.
- d. In your response to part e. you state, "Currently, mailing statements generated by Presort Jobfile do not contain any identification which would allow them to be associated either with a particular batch number or the job type/page count reports generated by the system. We intend to investigate such an option in the near future." Please provide copies of correspondence from the MOL system developer related to this "option." If no such correspondence exists, please explain the basis for your response and provide documentary verification thereof.

OCA/USPS-T1-49. Please refer to your response to OCA/USPS-T1-45.

- a. In part b. of your response you state, "[O]nly mail-merge jobs are currently combined into co-mingled batches; all others are handled as separate batches. Current (and future) system development is focused on improved functionality including the capability to combine all like documents into co-mingled batches."

Please provide copies of correspondence from the system developer relating to the ability or inability of the MOL system software to “combine all like documents into co-mingled batches.” If no such correspondence exists, please explain the basis for your response and provide documentary verification thereof.

- b. In part f. of your response you state, “[T]he possible page-count/job-type batches equals  $62 \times 48 = 3000$  [sic].” In his response to interrogatory OCA/USPS-T1-46(d), redirected from you, witness Plunkett states, “Some batch types are simply more likely to be chosen than others. Moreover, if document length is a parameter used to define potential batch types, some are highly unlikely to be chosen at all.”
  - i. Do agree with witness Plunkett’s statement? If so, what is the basis for your agreement?
  - ii. Please provide a table, containing  $62 \times 48$  cells, that displays the relative likelihood of each possible page-count/job-type batch and is consistent with the assumption that, on average, MOL pieces will be presorted to a depth justifying grant of the Automation Basic discounts.
  - iii. Please provide tables that allocate year-one MOL volume across subclass/page-count/job-type batches. Please show that this allocation is consistent with the assumption that, on average, MOL pieces will be presorted to a depth justifying grant of the Automation Basic discounts.

OCA/USPS-T1-50. Please refer to page 3, note 3, of your testimony. You state, “[A] universal Portable Document Format (PDF) input capability will be included to allow document creation using many unsupported applications.”

- a. Please confirm that such an “input capability” does not currently exist. If you do not confirm, please reconcile your response with witness Stirewalt's response to interrogatory OCA/USPS-T3-68.
- b. Please provide a firm date when such a capability will exist.

OCA/USPS-T1-51. Please provide an updated version of USPS-LR-6/MC98-1.

OCA/USPS-T1-52. At page 20 of its Initial Brief, the Postal Service stated that “the Postal Service expects that exemptions from volume minimums will be unnecessary if Mailing Online matures. The DMCS language exempting Mailing Online volume from the minimums simply permits the market test (and perhaps the experiment) to mature under conditions likely emulative of its final form.”

- a. Do you agree with this statement? Please state the basis for your agreement or disagreement.
- b. Would you agree that the characteristics of MOL jobs submitted near the end of the experiment would be more similar to jobs submitted under a permanent service than jobs submitted during the market test or toward the beginning of the experiment? Please explain the basis of your agreement or disagreement.

# CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink that reads "Emmett Rand Costich". The signature is written in a cursive, slightly slanted style.

Emmett Rand Costich  
Attorney

Washington, D.C. 20268-0001  
October 28, 1998